

Federal Defenders  
OF NEW YORK, INC.

Southern District  
52 Duane Street, 10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 658-9483

Tamara Giwa  
*Executive Director*

Jennifer L. Brown  
*Attorney-in-Charge*

September 26, 2024

**BY ECF**

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Sarah Valerio Pujols  
24 Cr. 442 (NRB)**

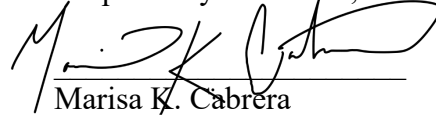
Honorable Judge Buchwald:

I am the attorney representing Sarah Valerio Pujols in the above-referenced matter and am writing to request a modification of Ms. Valerio's bail conditions. Specifically, the defense respectfully request that the Court modify Ms. Valerio's bail condition to allow her to travel to Indianapolis, Indiana from October 17 through October 21, 2024 to attend her niece's baby shower, the specific details of travel to be set by Pretrial Services. Additionally, the defense requests that Ms. Valerio be permitted to travel freely to the District of New Jersey. As it stands, Ms. Valerio's travel is restricted to only SDNY and EDNY; however, Ms. Valerio's close friends, who are her support network as she navigates this prosecution, live in the District of New Jersey. Ms. Valerio's parents and siblings all live out of state, mostly in Missouri. Given that, she has leaned heavily upon her friendships to help her get through the challenges she faces as a mother of a young child while managing a federal prosecution. Without restricted travel to New Jersey, Ms. Valerio would have ready access to her support network that has been critical for her thus far in this case.

On May 7, 2024, Ms. Valerio Pujols was released on a \$50,000 personal recognizance bond, cosigned by one financially responsible person, with travel restricted to SDNY/EDNY. She has been fully compliant with her conditions. Since her release on bail, she has traveled out-of-state – to Missouri – with court permission while remaining in full compliance. I have spoken to the Government and the Pretrial Services Officer in this case and they have no objection to this request.

Thank you for your consideration of this matter.

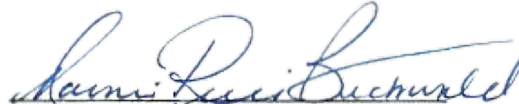
Respectfully submitted,



Marisa K. Cabrera  
Assistant Federal Defender  
(212) 417-8730

Application granted.

**SO ORDERED.**



NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: October 1, 2024

New York, New York

cc: AUSA Benjamin Anthony Gianforti  
Pretrial Services Officer Karina Chin Vileforte